

City of Hopewell
Attachment for Part 4 and Part 5
**VSMF GENERAL PERMIT REGISTRATION STATEMENT FOR STORM WATER
DISCHARGES**
FROM SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4)
(last revision date 8.16.10)

Admin

The City of Hopewell will update and where necessary provide additional schedules to implement its MS4 program and MS4 Program Plan including its BMPs and measurable goals in order to meet any new requirements included in the new General Permit for Discharges from Small Municipal Separate Storm Sewer Systems. The City of Hopewell understands that it may choose to apply for and obtain coverage under an individual VSMF permit instead of meeting the conditions of the General Permit.

The City of Hopewell defines its MS4 Program Plan as its Registration Statement for Coverage under the General Permit for Discharges from Small Municipal Separate Storm Sewer Systems dated November 30, 2007 and all documents, policies, procedures specified directly and those documents, policies, procedures necessary to implement all specified programs listed in the registration statement.

Responsible Party: The MS4 Program is administered through the Department of Public Works. The Director of Public Works is responsible for developing the updated MS4 Plan. The City Manager is for providing the appropriate certification to any documents.

Necessary Documents: Updated copy of this MS4 Program Plan.

Measurable goals: The updated copy of this MS4 Program Plan must be completed and submitted to DCR in compliance with any schedule included in the reissued General Permit (currently 180 days from effective date of the permit).

Items Needed for the Annual Report: The updated MS4 Program Plan must be submitted prior to the PY1 annual report and in compliance with the time frame included in the reissued General Permit.

To be completed as part of the MS4 Program Plan Update required by the New Permit (currently 180 days from effective date of the permit):

1. Update the permit requirements for the Six Minimum Control Measures.
2. Are any additional BMPs required to meet the new permit requirements?

3. Provide a description of the BMP, responsible party schedule including interim goals, responsible party, to implement the additional BMPs that are consistent with the new permit.
4. For each existing BMP included in the MS4 Program Plan, review and complete the following:
 - a. Does this BMP comply with the new General Permit or are modifications required?
 - b. If no modifications are required, then BMP remains the same.
 - c. If modifications are required, what modifications are required?
 - d. What is my proposed schedule for implementation of the modifications?
 - e. Include the proposed schedule in the Schedule and Evaluation Section.
 - f. Does the BMP address the pollutant identified in a TMDL wasteload allocation?
 - g. Which TMDL wasteload allocation?
 - h. How does the BMP address the pollutant identified in a TMDL wasteload allocation?
 - i. How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation?
 - j. When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation.

Minimum Control Measure: **Public Education and Outreach on Storm Water Impact**

Permit Requirements: (i) Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.

(ii) Guidance: You may use stormwater educational materials provided by your State, Tribe, EPA, environmental, public interest or trade organizations, or other MS4s. The public education program should inform individuals and households about the steps they can take to reduce stormwater pollution, such as ensuring proper septic system maintenance, ensuring the proper use and disposal of landscape and garden chemicals including fertilizers and pesticides, protecting and restoring riparian vegetation, and properly disposing of used motor oil or household hazardous waste. EPA recommends that the program inform individuals and groups how to become involved in local stream and beach restoration activities as well as activities that are coordinated by youth service and conservation corps or other citizen groups. EPA recommends that the public education program be tailored, using a mix of locally appropriate strategies, to target specific audiences and communities. Examples of strategies include distributing brochures or fact sheets, sponsoring speaking engagements before community groups, providing public service announcements, implementing educational programs targeted at school age children, and conducting community-based projects such as storm drains stenciling, and watershed and beach cleanups. In addition, EPA recommends that some of the materials or outreach programs be directed toward targeted groups of commercial, industrial, and institutional entities likely to have a significant stormwater impacts. For example: providing information to restaurants on the impact of grease clogging storm drains or to garages on the impact of oil discharges. You are encouraged to tailor your outreach program to address the viewpoints and concerns of all communities, particularly minority and disadvantaged communities, as well as any special concerns relating to children.

Minimum Control Measure: **Public Education and Outreach on Storm Water Impact**

Section II.B.1.a. – Storm Water information on City's website

Hopewell will continue to display information to educate the Public about impacts to stormwater on its website, specifically under the Department of Public Works Section of the website. We will monitor and update the information as necessary. Hopewell's site will also provide a link to the EPA for additional information on stormwater. Hopewell's website is Hopewellva.gov. Storm Water information is under the Public Works Department. The link to EPA is www.epa.gov.

Schedule and Evaluation: Public Works staff on a monthly basis will check the City's website and that of the EPA and update the link when a change has occurred and/or additional information becomes available.

Responsible Party: The Public Works Services Manager is responsible for monthly inspections of our website and EPA's site to determine the adequacy of the available information and recommend changes when needed. The Public Information Office has the responsibility to change Hopewell's website.

Necessary documents: E-mail documentation will be available to instruct the Public Information Officer to make appropriate changes to our website.

Measurable goals: The number of "hits" to the Public Works website is an indirect indicator of the amount of traffic/interest. If data is available to indicate the number of times the EPA link was inquired then that information will be available as an indicator of interest/use.

Items to be Reported in the Annual Report:

The number of inquiries to the website and the EPA link will be provided.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Public Education and Outreach on Storm Water Impact**

Section II.B.1.b – Storm Water information provided at Public meetings and in Public Buildings

Public Works promotes the Storm Water program at Public events and opportunities through speech and information. We have written articles in the City Currents, a publication of City information that is mailed to every City resident. We need to update our articles for inclusion in upcoming issues. This will be accomplished prior to next annual report.

We have Storm Water information on the City's website and ask citizens to report, to Public Work's Service Desk, concerns with activities involving individual(s) dumping items, in the streets or in drainage inlets. Hopewell has a large retired population which means that there are many "eyes" watching for anything that appears out-of-line or abnormal. Our citizens don't hesitate to call the appropriate City Department for any type of unlawful or suspicious activity. With that said, it isn't apparent through citizen complaint screening, and daily work assignments, that we have an illegal disposal problem in Hopewell. During basin cleaning activities, we have not seen evidence that indicates the street drains are used for illegal dumping.

Storm water information will be created and/or retrieved from sources such as other localities and the EPA website and available at City Hall, Community Center, and the Public Works Building. Additionally this same information will be made available at Public meetings. Updated information handouts on the subjects of Land Development and Storm Water Management requirements are available at public information stations outside the Office of the City Engineer and the Department of Development both located on the 3rd floor of City Hall.

Schedule and Evaluation: Storm water information will be provided at public meetings, this includes Council meetings and Ward meetings. Council typically meets twice a month on the second and fourth Tuesdays. There are some months where Council only meets once a month. Ward meetings are scheduled at the pleasure of individual Council members. Hopewell has an annual event called "Hooray for Hopewell" that attracts approximately 30,000 people. During these events, the City normally has a booth in order to provide information to

the Public. We will provide the City booth with stormwater information for distribution at this event.

Responsible Party: The Public Works Services Manager is responsible for gathering and maintaining a supply of information available. In most cases the information can be given to the City Public Information Officer for distribution at Public meetings, otherwise the Public Works Service Manager will ensure that "handouts" are available at these meetings.

Necessary Documents: The informational handouts containing stormwater information. Again, Updated information handouts on the subjects of Land Development and Storm Water Management requirements are available at public information stations outside the Office of the City Engineer and the Department of Development both located on the 3rd floor of City Hall

Measurable goals: The number of meetings where stormwater information is available to the Public. Quantity of handouts distributed during the Public meetings/events.

Items to be reported in the Annual Report: Copies of the informational handout and quantity distributed on an annual basis.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Public Education and Outreach on Storm Water Impact**

Section II.B.1.c – Stormwater stenciling/decaling of storm drains

The bulk of the storm drains were stenciled under a partnership with the City, Industry, and Hopewell High School. The Industry provided the decals and materials, City provided the supervision, and high schools students applied the decals to the majority of the storm drains. Public Works crews completed applying the decals to the remaining storm inlets. It has been observed that some decals have been removed from the storm inlets. We will survey and replace those removed decals.

Schedule and Evaluation: Annually, Public Works staff will survey the stormwater inlets for the decals and replace those that are missing.

Responsible Party: The Public Works Street Maintenance Supervisor is responsible for procuring the decals, other materials, and providing the labor force to re-apply decals to those areas void of the decals.

Necessary Documents: The survey results that indicate the number of missing decals and number of decals placed.

Measurable goals: The number of decals replaced.

Items to be reported in the Annual Report: The quantity of decals discovered missing and the number that was replaced.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Public Education and Outreach on Storm Water Impact**

Section II.B.1.d – Pet Waste Management for Municipal Properties

Hopewell has 20 parks where residents are permitted to walk pets provided they are properly licensed and leashed. Permanent signs were installed informing owners to cleanup after their pets. During the mowing season, Parks and Recreation staff will be asked to report problems they observe resulting from animal waste not removed by pet owners.

Schedule and Evaluation: Annually, Parks and Recreation staff will determine if animal waste is a problem at City Parks. If no problem is apparent we will continue with just the signage. If a problem is detected that requires us to take addition measures then staff with Public Works and Parks and Recreation will develop a strategy to handle that situation.

Responsible Party: Public Works and Parks and Recreation staff will meet and determine if there is a problem with animal waste at City Parks.

Necessary Documents: N/A

Measurable goals: I have not observed an abundance of pet owners with their animals in City Parks and my perception is that we do not have a problem. If it becomes a problem it along with our plan to correct the situation will be included in our annual reports.

Items to be reported in the Annual Report: We will make mention of any problems along with remedies during all annual reports.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Public Education and Outreach on Storm Water Impact**

Section II.B.1.e – Increase Public Employee, Business, and General Public Knowledge of hazards associated with illegal discharges and improper disposal of waste, including pertinent legal implications.

Public Works acquired a Storm Water Training Course, titled, “ Municipal Storm Water Pollution Prevention, Storm Watch”, the course consist of a DVD, attendance sheet, handouts, and test. The Course covers, Good Housekeeping & Spill Prevention, Vehicle & Equipment Washing, Vehicle & Equipment Maintenance, Spill Reporting & Response, Street Maintenance, Outdoor Storage of Materials & Wastes, and Landscaping & Lawn Care. Public Works employees reviewed the course on January 4-7, 2010. We have copies of the attendance list on file. One initiative that we desire to take, after watching the course, is the possible relocation of our vehicle washing operation. The relocation will enable all wash water to go through the City's sanitary sewer system. If budget allows, we plan to relocate our vehicle washing facility and add “spill kits” on the appropriate equipment. This task is planned during this current permit period.

So far, the City hasn't seen the need for a Public campaign threatening legal action for perpetrators of a problem that doesn't exist. Our Code(s) makes it a misdemeanor for illegal dumping and/or using street drainage inlets for any purpose other than rain water.

Our businesses and population are aware of Hopewell's Honeywell Plant past problems, in the 1970's, with Kepone and the cost and embarrassment that followed. As a result of that and the fact that we are the “Home” for several major industrials, our citizen's and Government officials are sensitive and supportive of practices that enhance the environmental health of the City.

Schedule and Evaluation: Public Works employees will bi-annually (once every two years) review the Storm Water Training Course, “Municipal Storm Water Pollution Prevention, Storm Watch” .

Responsible Party: Public Works Service Manager

Necessary Documents: Attendance roster

Measurable goals: Employees successfully pass the test included with the DVD Course.

Items to be reported in the Annual Report: Results of the bi-annual testing.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Public Education and Outreach on Storm Water Impact**

Section II.B.1.f – Improved outreach program to address viewpoints and concerns of target audiences, with a recommended focus on minorities, disadvantaged audiences and minors

In addition to our normal outreach efforts, local media, informational handouts, Citizen's Academy, public events, such as Hoorah for Hopewell, our two semi-annual cleanup weeks, and work with FOLAR, Public Works staff has been involved with at least two Ward meetings (this reporting period). These meetings were held in the minority areas of Hopewell and extensively involved the Public Works Director with drainage, curb/gutter issues and information provided on storm water.

Hopewell has a different approach to leaf collection than do most localities. Our service is more "personalized" and attempts to keep the residents from placing their leaves in the street. Depending on individual criteria this service is provided free or at a very low cost and requires the resident to rake the leaves and "windrow" them on their side of the right-of-way (out of the street). Once the leaves are ready for pickup, a telephone call is all that's required for us to respond and remove the leaves with a vacuum truck. We allow three pickups per residence from the period of November 1 to January 31, each year. The leaves are then recycled into mulch.

Schedule and Evaluation: Continue to provide storm water informational materials at Public events as these events take place.

Responsible Party: Public Works Director or representative

Necessary Documents: N/A

Measurable goals: N/A

Items to be reported in the Annual Report: Statement of events where storm water Public Information was made available.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Public Education and Outreach on Storm Water Impact**

Section II.B.1.g – Targeted strategies towards local groups of commercial, industrial, and institutional entities likely to have a significant storm water impacts.

We have not developed a strategy solely targeting commercial or small industrial institutions. We plan to address the commercial and industrial approaches in future reports. It needs to be pointed out that our major industries have their own General Storm Water Discharge Permits. None-the-less, on the provided citywide GIS Overview Map, DPW has also identified and included in the listed inventory, all the retention ponds in the City, including the industry sites {See Attachment B}. Each new industry is informed by the City of their need to file for a General Storm Water Discharge Permit.

Schedule and Evaluation:
Responsible Party

Necessary Documents: N/A

Measurable goals

Items to be reported in the Annual Report

Modifications per required Admin Update: TSD

Minimum Control Measure: **Public Education and Outreach on Storm Water Impact**

Section II.B.1.h –TMDL Special Condition

The City of Hopewell has approved TMDLs (Total Maximum Daily Limits) with four distinct WLAs (Waste Load Allocations) for fecal coliform bacteria. According to information available from DEQ (Department of Environmental Quality) those WLAs are:

1.44 E+12 cfu/day to the Appomattox River
3.87 E+10 cfu/day to the James River (tidal)
2.61 E+08 cfu/day to Bailey Creek
2.24 E+10 cfu/day to Bailey Bay

The operator shall conduct an annual characterization that estimates the volume of storm water discharged, in cubic feet, and the quality of pollutant identified in the WLA, in a unit consistent with the WLA, discharged by the regulated small MS4. This must accompany the annual report due October 1, 2010.

The City of Hopewell's Waste Water treatment Plant is operating under a "Consent Order" from DEQ for sewer overflows. These overflows primarily occur during heavy rain events in which some of the infrastructure becomes overwhelmed. The Consent Order and repair, maintenance, and longer range plans to fix this situation are included below. Also work accomplished to date to reduce the overflows as well as solve I and I problems are also listed.

Minimum Control Measure: **Public Involvement/Participation**

Permit Requirements: Public involvement/participation. (i) At a minimum, comply with applicable state, tribal, and local public notice requirements when implementing the stormwater management program.

(ii) Guidance: EPA recommends that the public be included in developing, implementing, and reviewing your stormwater management program and that the public participation process should make efforts to reach out and engage all economic and ethnic groups. Opportunities for members of the public to participate in program development and implementation include serving as citizen representatives on a local stormwater management panel, attending public hearings, working as

citizen volunteers to educate other individuals about the program, assisting in program coordination with other preexisting programs, or participating in volunteer monitoring efforts.

Minimum Control Measure: **Public Involvement/Participation**

Section II.B.2.a – Citywide Residential Cleanup

Hopewell's Department of Public Works and the City's Clean City Commission partner and provides a week in the fall and a week in the spring for residential cleanup. Normal disposal fees are waived during these cleanup periods to encourage residents to cleanup around their residences. The only fees collected are for those Freon containing appliances to cover the contractor cost to evacuate the Freon. This is an extremely popular program and the events are well attended.

The Clean City Commission reimburses the Department of Public Works for approximately one half of the actual cost for labor and disposal for these events.

Schedule and Evaluation: There are two week long events held each year, one in the fall and one in the spring.

Responsible Party: Public Works and Clean City Commission.

Necessary Documents: N/A

Measurable goals: Usage statistics during these events as compared to a "normal" week.

Items to be reported in the Annual Report: Usage statistics during these events as compared to a "normal" week.

Modifications per required Admin Update: TSD

Section II B.2.b.- Increased individual and group involvement in local water quality improvement initiatives including the promotion of local restoration and cleanup projects, programs, meetings and other opportunities for public involvement.

The City of Hopewell, specifically the Public Works Department and the Department of Parks and Recreation work closely with the Friends of the Lower Appomattox River (FOLAR). A major force of FOLAR is Wayne Walton, a Hopewell City Councilor. We provide labor, equipment, and disposal of all items obtained during these cleanup events. There is at least one event a year and usually more. All upcoming events are announced at Council meetings and/or local media and usually covered prior and post event, in the local newspaper. The group has concentrated their efforts to the Appomattox River from Petersburg to Hopewell.

Hopewell Public Works, in concert with the Clean City Commission, annually hold a week-long Fall and Spring Citywide Cleanup. These events are approved, announced at Council meetings and advertised in the local newspaper. Public Works also posts signs along Route 36 and at City Hall with the dates of the upcoming events. As a result of holding these events during the same months (Fall event in October and Spring event in May) the public has grown accustomed to the general timing of the events and they are ready with accumulated debris. Some residents call the Public Works Service Desk for the schedule. Our arrangement with the Clean City Commission is that they will fund half the cost of each event with State Grant funding. During recent times the amount of State funding has decreased and Public Works has been taking on most, if not all of the financial burden for these Clean-up events. The Cleanup periods are very popular with the public and something they look forward to.

These events allow the Public to dispose of debris at no cost; with one exception, a minimal charge for Freon containing appliances. These events may very well be responsible for eliminating illegal dumping in Hopewell; as Hopewell does not have an illegal dumping problem.

Schedule and Evaluation: Folar events are scheduled on an as-needed basis and when volunteers are available to participate. City-wide cleanup events typically take place in October and April.

Responsible Party: The Public Works Services Manager is responsible for gathering and maintaining a supply of information. In most cases the information can be given to the City Public Information Officer for distribution at Public meetings, otherwise the Public Works Service Manager will ensure that “handouts” are available at these meetings.

Necessary Documents: The informational handouts containing stormwater information.

Measurable goals: The number of meetings where stormwater information is available to the Public. Quantity of handouts distributed during the Public meetings/events.

Items to be reported in the Annual Report: Copies of the informational handout and quantity distributed on an annual basis.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Public Involvement/Participation**

Section II.B.2.c – Storm Water information provided at Public meetings and in Public Buildings

Stormwater information will be created and/or retrieved from sources such as other localities and the EPA website and available at City Hall, Community Center, and the Public Works Building. Additionally this same information will be made available at Public meetings.

In January 2009, Hopewell started a Citizen's Academy where all City Departments spoke to the Public about operations of the various Departments and other pertinent topics. This “Academy” is open to everyone via advertisement in the local media. The program was offered on 10 consecutive Thursday evenings in which one or two Departments were on the program per week. Public attendance was rewarded with a certificate and Public recognition. During the Public Works presentation the Public was informed of the current status of Hopewell's Stormwater Program and its requirements and purpose. The City planned to hold another Academy in July 2009, but it was cancelled due to lack of participation/interest.

The EPA publication, “After the Storm” was copied and distributed to the Public at Council meetings, Citizen's Academy, City Buildings, and made

available at the Hopewell City booth during the annual City event “Hooray for Hopewell”, September 2009. This event is the largest Hopewell gathering of the public and is attended by 30,000+ people over a two to three day event. This most recent event was a two- day event due to budget constraints.

Provided by attachment to the MS4 General Permit is the widely circulated educational handout, which is used daily to explain the City's storm water management strategies, requirements and general overview. The handout is done in simple outline bullet form to make it easy-to-read, understand and quickly reference. The City readily provides and refers to the outlined principals and practices. The handout document is titled “The City of Hopewell's Overview of Principals, Practices & Policies related to Storm Water Management (SMW)” {see attachment A}.

In addition, the City provides ready available comprehensive information handouts on:

- 1) City Policy on all new residential development {see attachment AB}; and
- 2) City Ordinance regarding adoption of the Chesapeake Bay Preservation Act (CBPA) which outlines all the CBPA regulations {see attachment AC}; and
- 3) DCR Resource Protection Area {RPA} delineation guidance (see attachment AD)

Schedule and Evaluation: Stormwater information will be provided at public meetings, this includes Council meetings and Ward meetings. Council typically meets twice a month on the second and fourth Tuesdays. There are some months where Council only meets once a month. Ward meetings are scheduled at the pleasure of individual Council members. Hopewell has an annual event called “Hooray for Hopewell” that attracts approximately 30,000 people. During these events, the City normally has a booth in order to provide information to the Public. We will provide the City booth with stormwater information for distribution at this event.

Responsible Party: The Public Works Services Manager is responsible for gathering and maintaining a supply of information available. In most cases the information can be given to the City Public Information Officer for distribution at Public meetings, otherwise the Public Works Service Manager will ensure that “handouts” are available at these meetings.

Necessary Documents: The informational handouts containing stormwater information.

Measurable goals: The number of meetings where stormwater information is available to the Public. Quantity of handouts distributed during the Public meetings/events.

Items to be reported in the Annual Report: Copies of the informational handout and quantity distributed on an annual basis.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Public Involvement/Participation**

Section II.B.2.d – Request Community groups and citizens report drainage problems

Using various media outlets such as newspaper articles, *City Currents* newsletters, the Automated Citizen's Information System (ACIS), and handouts we create regarding stormwater, public reporting of drainage problems will be encouraged along with providing a telephone number to report these situations.

Schedule and Evaluation: Public Works will provide appropriate information to the Public Affairs Officer for inclusion on the ACIS and will validate the information prior to each PY annual report. Handouts distributed at Public meetings will be updated as needed and reviewed annually. Once a year, Public Works will submit a newspaper article and a *City Currents* article related to stormwater/drainage.

Responsible Party: The Public Works Services Manager is responsible for providing stormwater information for the various types of dissemination discussed in this BMP. The Public Affairs Officer is responsible for inclusion of the information in the ACIS.

Necessary Documents: Copies of information provided to the public (media methods described herein).

Measurable goals: The appropriate number of articles is submitted each year. Public Works will look at our work order system and try to determine if there is any correlation between our publicizing stormwater/drainage information and the amount of related calls we receive.

Items to be reported in the Annual Report: Copies of articles, information provided to the public.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Public Involvement/Participation**

Section II B.2.e. Provide access to or copies of the annual report upon request of interested parties in compliance with all applicable freedom of information regulations.

Public Works will develop and implement a process where the Public can access our Program and Annual Reports via the City's website and this arrangement will be described by Public Notice. We also plan to have the Plan and Annual Report documents available by visiting the Public Works Office and/or City Engineer's Office. This will be in place prior to second annual report.

Hopewell has no problem with providing any information regarding our MS4 General Permit Plan/Program and will abide by any Freedom of Information Act request. I can't recall any request for our MS4 Plan/Program to date.

Prior to the next reporting period, Hopewell will make Public Notice where our MS4 General Permit Plan/Program is located and provide information regarding review and obtaining a copy of the documentation. We will also develop public access to our Program and Annual Reports via the City's website and City Office(s). The City Engineer will provide through electronic transfer, PDF copies via email delivery.

Schedule and Evaluation: Public Works will provide appropriate information to the Public Affairs Officer for inclusion on the ACIS and will validate the information prior to each PY annual report. Handouts distributed at Public meetings will be updated as needed and reviewed annually. Once a year, Public Works will submit a newspaper article and a City Currents article related to storm water/drainage.

Responsible Party: The Public Works Services Manager is responsible for providing storm water information for the various types of dissemination discussed in this BMP. The Public Affairs Officer is responsible for inclusion of the information in the ACIS.

Necessary Documents: Copies of information provided to the public (media methods described herein).

Measurable goals: The appropriate number of articles is submitted each year. Public Works will look at our work order system and try to determine if there is any correlation between our publicizing storm water/drainage information and the amount of related calls we receive.

Items to be reported in the Annual Report: Copies of articles, information provided to the public.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Public Involvement/Participation**

Section II.B.2.f – Promote the availability of the operator’s MS4 Program Plan and any modifications for public review and comment. Public notice shall be given by any method reasonably calculated to give actual notice of the action in question to the person(s) potentially affected by it, including press releases or any other forum or medium to elicit public participation. Provide access to or copies of the MS4 Program Plan or any modifications upon request of interested parties in compliance with all applicable freedom of information regulations.

Storm Water information will be created and/or retrieved from sources such as other localities and the EPA website and available at City Hall, Community Center, and the Public Works Building. Additionally this same information will be made available at Public meetings.

In January 2009, Hopewell started a Citizen's Academy where all City Departments spoke to the Public about operations of the various Departments and other pertinent topics. This "Academy" is open to everyone via advertisement in the local media. The program was offered on 10 consecutive Thursday evenings in which one or two Departments were on the program per week. Public attendance was rewarded with a certificate and Public recognition. During the Public Works presentation the Public was informed of the current status of Hopewell's Storm Water Program and its requirements and purpose. The City planned to hold another Academy in July 2009, but it was cancelled due to lack of participation/interest.

The EPA publication, "After the Storm" was copied and distributed to the Public at Council meetings, Citizen's Academy, City Buildings, and made available at the Hopewell City booth during the annual City event "Hooray for Hopewell", September 2009. This event is the largest Hopewell gathering of the public and is attended by 30,000+ people over a two to three day event. This most recent event was a two- day event due to budget constraints.

Provided by attachment to the MS4 General Permit is the widely circulated educational handout, which is used daily to explain the City's storm water management strategies, requirements and general overview. The handout is done in simple outline bullet form to make it easy-to-read, understand and quickly reference. The City readily provides and refers to the outlined principals and practices. The handout document is titled "The City of Hopewell's Overview of Principals, Practices & Policies related to Storm Water Management (SMW)" {see attachment A}.

Schedule and Evaluation: Storm Water information will be provided at public meetings, this includes Council meetings and Ward meetings. Council typically meets twice a month on the second and fourth Tuesdays. There are some months where Council only meets once a month. Ward meetings are scheduled at the pleasure of individual Council members. Hopewell has an annual event called "Hooray for Hopewell" that attracts approximately 30,000 people. During these events, the City normally has a booth in order to provide information to the Public. We will provide the City booth with storm water information for distribution at this event.

Responsible Party: The Public Works Services Manager is responsible for gathering and maintaining a supply of information available. In most cases the information can be given to the City Public Information Officer for distribution at Public meetings, otherwise the Public Works Service Manager will ensure that "handouts" are available at these meetings.

Necessary Documents: The informational handouts containing storm water information.

Measurable goals: The number of meetings where storm water information is available to the Public. Quantity of handouts distributed during the Public meetings/events.

Items to be reported in the Annual Report: Copies of the informational handout and quantity distributed on an annual basis.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Public Involvement/Participation**

Section IIB.2.g. Objective: – Participate, through promotion, sponsorship, or other involvement, in local activities aimed at increasing public participation to reduce storm water pollutant loads and improve water quality.

The City of Hopewell, specifically the Public Works Department and the Department of Parks and Recreation work closely with the Friends of the Lower Appomattox River (FOLAR). A major force of FOLAR is Wayne Walton, a Hopewell City Councilor. We provide labor, equipment, and disposal of all items obtained during these cleanup events. There is at least one event a year and usually more. All upcoming events are announced at Council meetings and local media and usually are covered prior and post event, in the local newspaper. The group has concentrated their efforts to the Appomattox River from Petersburg to Hopewell.

Hopewell Public Works, in concert with the Clean City Commission annually hold a week-long Fall and Spring Citywide Cleanup. These events are approved, announced at Council meetings, and described in detail newspaper articles. Additionally, Public Works posts signs along Route 36 and at City Hall with the dates of the upcoming events. As a result of holding these events during the same months (Fall event in October and Spring event in May) the public has grown accustomed to the general timing of the events and they are ready with debris. Some residents call the Public Works Service Desk for the schedule. Our arrangement with the Clean City Commission is that they will fund half the cost of each event with State Grant funding. During recent times the amount of State funding has decreased and Public Works has been taking on most, if not, the entire financial burden for these Clean-up events. The Cleanup periods are very popular with the public and something they look forward to.

These events allow the Public to dispose of debris at no cost; with one exception, a minimal charge for Freon containing appliances. These events may very well be responsible for eliminating illegal dumping in Hopewell as Hopewell does not have an illegal dumping problem.

In January 2009, Hopewell started a Citizen's Academy where all City Departments spoke to the Public about operations of the various Departments and other pertinent topics. This "Academy" is open to everyone via local media advertisement. The program was offered on 10 consecutive Thursday evenings in which one or two Departments were on the program per week. Public attendance was rewarded with a certificate and Public recognition. During the Public Works' presentation the Public was informed of the current status of Hopewell's Stormwater Program and its requirements and purpose. The City planned to hold another Academy in July 2009, but it was cancelled due to lack of participation/interest.

The EPA publication, "After the Storm" was copied and distributed to the Public at Council meetings, Citizen's Academy, City Buildings, and made available at the Hopewell City booth during the annual City event "Hooray for Hopewell", September 2009. This event is the largest Hopewell gathering of the public and is attended by 30,000+ people over a two to three day event. This most recent event was a two- day event due to budget constraints.

One of the primary instructional materials for the Citizen's Academy will include the City's Overview of Principals, Practices & Policies related to Storm Water Management {See Attachment A} and the GIS Overview Map {see attachment B}

Schedule and Evaluation: Storm Water information will be provided at public meetings, this includes Council meetings and Ward meetings. Council typically meets twice a month on the second and fourth Tuesdays. There are some months where Council only meets once a month. Ward meetings are scheduled at the pleasure of individual Council members. Hopewell has an annual event called "Hooray for Hopewell" that attracts approximately 30,000 people. During these events, the City normally has a booth in order to provide information to the Public. We will provide the City booth with storm water information for distribution at this event.

Responsible Party: The Public Works Services Manager is responsible for gathering and maintaining a supply of information available. In most cases the information can be given to the City Public Information Officer for distribution at Public meetings, otherwise the Public Works Service Manager will ensure that "handouts" are available at these meetings.

Necessary Documents: The informational handouts containing storm water information.

Measurable goals: The number of meetings where storm water information is available to the Public. Quantity of handouts distributed during the Public meetings/events.

Items to be reported in the Annual Report: Copies of the informational handout and quantity distributed on an annual basis.

Modifications per required Admin Update:

Minimum Control Measure: **Illicit Discharge Detection and Elimination**

Permit requirements: (i).You must develop, implement, and enforce a program to detect and eliminate illicit discharges into your small MS4.

(ii).You must:

- (A) Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and locations of all waters of the United States that receive discharges from these outfalls;
- (B) To the extent allowable under State, Tribal, or local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into your storm sewer system and implement appropriate enforcement procedures and actions;
- (C) Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to your system; and
- (D) Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.

(iii). You must address the following categories of non-storm water discharges or flows (i.e., illicit discharges) only if you identify them as significant contributors of pollutants to your small MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground water, uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20)), uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, and street wash water (discharges or flows from fire

fighting activities are excluded from the effective prohibition against non-storm water and need only be addressed where they are identified as significant sources of pollutants to waters of the United States.

(iv). Guidance: EPA recommends that the plan to detect and address illicit discharges include the following four components: procedures for locating priority areas likely to have illicit discharges; procedures for tracing the source of an illicit discharge; procedures for removing the source of the discharge; and procedures for program evaluation and assessment. EPA recommends visually screening outfalls during dry weather and conducting field tests of selected pollutants as part of the procedures for locating priority areas. Illicit discharge education actions may include drain stenciling, a program to promote, publicize, and facilitate public reporting of illicit connections or discharges, and distribution of outreach materials.

Minimum Control Measure: **Illicit Discharge Detection and Elimination**

Section II.B.3b.1. –Development of a Storm Sewer System Map

Included in this application for MS4 permit is a copy of a storm water map showing the major outfalls and identifying the body of water where the discharge occurs. This submittal is somewhat of a “hurdle” for us but we intend to continue refining the mapping of the storm water system to include not only the outfalls but eventually the entire drainage system.

Schedule and Evaluation: We plan to complete the total system mapping by the PY third annual report due date.

Responsible Party: The City Engineer working in concert with the GIS Manager and consultants are responsible to complete updates to the mapping our storm water system.

Necessary Documents: Copies of the map. Attachments: GIS Mapping “B”/ “C” / & “D” show key storm water items related to this plan.

Measurable goals: For this application submission, a copy of the outfall map. During future annual reports an update will be submitted detailing our current progress.

Items to be reported in the Annual Report: A report on the progress to-date.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Illicit Discharge Detection and Elimination**

Section II.B.3b.2. – Illicit Discharge Ordinance

Section 31 of the Municipal Code of the City of Hopewell covers illicit discharges into the storm sewer. Section 31-4 defines violations of this Code as a Class I misdemeanor. Section 31-6(a) covers animal waste, Section 31-6(b) covers the unlawful discharge of polluted waters in the storm sewer, and Section 31-7 handles the discharge of storm water and other unpolluted drainage.

Schedule and Evaluation: Prior to each annual reporting deadline, our City Code will be reviewed and modified if we feel appropriate.

Responsible Party: The author of the storm water MS4 application, which currently is the Director of Public Works. The City Attorney and City Council will become involved if the need arises.

Necessary Documents: A copy of the ordinance will be submitted with this application.

Measurable goals: N/A

Items to be reported in the Annual Report: A statement included in the annual reports that the current ordinance is sufficient and/or a copy of the modified ordinance if necessary.

Modifications per required Admin Update:

Minimum Control Measure: **Illicit Discharge Detection and Elimination**

Section II B.3b.3 Develop and implement procedures to detect and address non storm water discharges, including illegal dumping, to the regulated small MS4.

The Department of Public Works through the City Engineers office, administers to a **Land Disturbance Permitting** (LDP) program that closely or exactly mirrors the E & S Green Handbook guidelines set forth by DCR. The City Engineer and City Planner have completed the DCR Plan Reviewer/Program Administrator certifications. The design review & permitting inspection programs are both audited annually by the local DCR authorities. Based on the February 2009 audit, the City had noted areas to improve on and was deemed inconsistent. A corrective action plan was filed. The program administration adjustments were made. The City was notified by DCR in May of 2010 that the latest audit found the City to be fully consistent in all grading categories.

The DPW Permitting E & S program inspector has remained DCR certified and just recently was recertified

The DPW Permit Inspector, under the supervision of the City Engineer, carries out weekly site inspections on all ongoing and outstanding LDP projects. Within 48 hours of a significant weather event the same DPW Permit Inspector performs a site inspection / assessment on all ongoing LDP projects.

The DPW Permit Inspector keeps a chronological diary log book on all the active and incomplete non-active LDP projects.

The DPW Permit Inspector communicates the inspection assessment and all noted corrections to the Responsible Land Disturber (RDL). The Permit Inspector's written report is provided on the official DPW City of Hopewell Inspection Form, which is a mirror image of the Sample DCR form. The official inspection form outlines the needed corrections, addresses the time or urgency the corrections need to be performed, and consequences if not.

All of the above inspection LDP documentation is kept in the DPW Permit inspectors log book, which remains ready for review by DCR officials whenever requested.

Minimum Control Measure: **Illicit Discharge Detection and Elimination**
Section II B.3b.4.- Prevent or minimize to the maximum extent practicable, the discharge of hazardous substances or oil in the storm water discharges(s) from the regulated small MS4.

In addition, the MS4 Program must be reviewed to identify measures to prevent reoccurrence of such releases and to respond to such releases, and the program must be modified where appropriate. This permit does not relieve the operator or the responsible parties of any reporting requirements of 40 CFR Part 110 (2001), 40 CFR Part 117 (2001) and 40 CFR Part 302 (2001) or 62.1-44.34:19 of the Code of Virginia.

DPW response here is DITTO the response to Section II.B.3b.3 above

Being a small very mature City, and having a very close neighborhood population that pays a lot of attention to their surroundings, we have few investigation cases related to illegal discharges or dumping. None-the-less, the DPW Right-of-Way Permit Inspector is trained to keep a watchful eye on the potentials. He takes an active role in monitoring the City as he travels to sites citywide. Any cases are pursued immediately and reports, if deemed necessary, will be done on the same form as the LDP inspection form. Notifications to the suspected culprits will be handled accordingly.

Some cases may come through the DPW Customer Service desk. They would be handled as described.

Minimum Control Measure: **Construction Site Storm Runoff**

(i) You must develop, implement, and enforce a program to reduce pollutants in any stormwater runoff to your small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre must be included in your program if the construction activity is part of a larger common plan of development or sale that would disturb one acre or more. If NPDES permitting authority waives requirements for stormwater discharges associated with small construction activity in accordance with § 122.26(b) (15)(i), you are not required to develop, implement, and /or enforce a program to reduce pollutant discharges from such sites.

(ii) Your program must include the development and implementation of, at a minimum (A) An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State, Tribal, or local law;

- (B) Requirements for construction site operators to implement appropriate erosion and sediment control best management practices;
 - (C) Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;
 - (D) Procedures for site plan review which incorporate consideration of potential water quality impacts;
 - (E) Procedures for receipt and consideration of information submitted by the public, and
 - (F) Procedures for site inspection and enforcement of control measures.
- (iii) *Guidance: Examples of sanctions to ensure compliance include non-monetary penalties, fines, bonding requirements and/or permit denials for non-compliance. EPA recommends that procedures for site plan review include the review of individual preconstruction site plans to ensure consistency with local sediment and erosion control requirements. Procedures for site inspections and enforcement of control measures could include steps to identify priority sites for inspection and enforcement based on the nature of the construction activity, topography, and the characteristics of soils and receiving water quality. You are encouraged to provide appropriate educational and training measures for construction site operators. You may wish to require a stormwater pollution prevention plan for construction sites within your jurisdiction that discharge into your system.*

Minimum Control Measure: **Construction Site Storm Runoff**

Section II.B.4.b.1 – Erosion and Sediment Control Ordinance

City of Hopewell Ordinance (Section 14) requires that the standards and format of Chapter 3 of the current edition of the Virginia Erosion and Sediment Control Handbook be used to control erosion.

The City Engineer requires A&E firms to place Erosion and Sediment Control notes that basically placed the language from Virginia Sediment Control requirements onto construction drawings prior to his plan approval.

Schedule and Evaluation: Approved construction plans are required to have the appropriate E&S notes on the drawings.

Responsible Party: The City Engineer and the City Planner.

Necessary Documents: Approved construction plans since February 1, 2007.

Measurable goals: Plans approved with the appropriate E&S notes.

Items to be reported in the Annual Report: N/A

Modifications per required Admin Update:

Minimum Control Measure: **Construction Site Storm Runoff**

Section II.B.4.b.2– Construction Site Operator to implement appropriate E&S:

The City Engineer requires contractors to add geotechnical and E&S notes to drawings that basically reinstate Commonwealth of Virginia requirements and BMPs. This helps ensure that all personnel in the construction process have readily available necessary guidance from the drawings to properly execute construction tasks and all E&S notes required are covered and/or the appropriate action is referenced on the plans.

Schedule and Evaluation: Appropriate E&S notes are required on construction drawings.

Responsible Party: The City Engineer.

Necessary Documents: N/A.

Measurable goals: Plans with appropriate E&S notes and references.

Items to be reported in the Annual Report: N/A.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Construction Site Storm Runoff**

Section II.B.4.b.3 – Construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality

Since the reorganization of the Engineering Section, transferring from Development to Public Works and the recent hiring of the City Engineer major improvements were realized with regard to E&S control and other geotechnical concerns. We will ensure that site operators control of construction waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste are covered either by appropriate drawing notes and/or checklist items attached to each building permit.

Schedule and Evaluation: Made part of the construction documents as soon as established.

Responsible Party: The City Engineer.

Necessary Documents: Checklist items or notes added to construction drawings. The City Engineer's office reviews plans and permit submissions. Each permit has attached the review and inspection checklist which addresses the site operator's conformance inspection items {see attachment AE for the sample form}

Measurable goals: These types of issues quit showing up out on the job site.

Items to be reported in the Annual Report: Prior to PY1 annual report notes and/or checklist included in the first annual report and afterwards if needed.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Construction Site Storm Runoff**

Section II.B.4.b.4 –Site plan review:

As a result of Hopewell being located on two rivers, the Appomattox and the James, and the fact that we operate under the Chesapeake Bay Preservation Act, we are very sensitive and cognizant of water quality impacts from construction activities and issues that would cause further harm to the water quality. Our GIS mapping system has the RPA and RMA areas identified. One of the first issues reviewed by the City Planner and City Engineer is the affect construction will have on the watershed, erosion and sediment control challenges, along with and other drainage considerations.

Schedule and Evaluation: This process begins as soon as we learn of new development from word-of-mouth or the receipt of preliminary drawings.

Responsible Party: The City Engineer and the City Planner.

Necessary Documents: (Please refer to all the attached A-Series attachments to get a comprehensive summary).

Measurable goals: The elimination of misunderstanding among on-site construction personnel and City officials regarding expectations and requirements.

Items to be reported in the Annual Report: N/A.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Construction Site Storm Runoff**

Section II.B.4.b.5-Receipt and consideration of Public Information:

Construction projects are presented at Public hearings at the Planning Commission and City Council meetings. Minutes of the meetings and public comments are recorded. Public concerns and opinions are addressed and incorporated into project plans.

Schedule and Evaluation: These meetings convene and are necessary prior to construction taking place.

Responsible Party: The City Planner, Planning Commission, and the City Council.

Necessary Documents: Minutes from the Planning Commission and Council meetings.

Measurable goals: N/A.

Items to be reported in the Annual Report: N/A.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Construction Site Storm Runoff**

Section II.B.4.b.6– Site Inspection and Enforcement:

Hopewell's Construction Inspector works directly for the City Engineer and is an integral part of the construction inspection process including land disturbing activities. Our DPW Permits Construction Inspector is certified as a DCR Erosion and Sediment Control Inspector (certification #877). His certification expires in 2010. He will renew his certification status through the online process and thereby maintain current certification status.

Hopewell has several options available to ensure compliance and take enforcement action for non-compliance such as Planning Commission, City Planner, and City Engineer review and approval. We can withhold building permits and/or not issue certificates of occupancy, placed claim against project bonds, and take legal action, if necessary.

Schedule and Evaluation: Construction plans are reviewed and required to have appropriate notes posted on them that adequately detail DCR Erosion and Sediment Control requirements for the type of land disturbing activity involved.

Responsible Party: The City Engineer, the City Planner, and the Construction Inspector

Necessary Documents: A copy of DCR Erosion and Sediment Control Manual (green book) and the Construction Inspector's certification. In addition please refer to the A-Series attachments to this permit program plan which is a more comprehensive summary of the City performance plan. The same attachments are readily available as a source of public information. They can be obtained at the permitting offices of The City Engineer and Director of Development

Measurable goals: A trend may be developed based on quantity of land disturbing issues that arise.

Items to be reported in the Annual Report: Problem issues involved with land disturbing activities.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Construction Site Storm Runoff**

Section II.B.4.c.1-Total number of activities See Attachment “E” on the latest listing of active land development cases where Land Disturbance Permits (LDP) are in effect. The list is updated monthly as new permits are issued or active ones are closed out.

Minimum Control Measure: **Construction Site Storm Runoff**

Section II.B.4.c.2-Total Disturbed acres

DITTO - See Attachment “E” on the latest listing of active land development cases where Land Disturbance Permits (LDP) are in effect. The list is updated monthly as new permits are issued or active ones are closed out. The listing has a summation column on the estimated disturbed acreage involving each case.

Minimum Control Measure: **Post-construction Stormwater Management in New Development and Redevelopment**

- (i) *You must develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are a part of a larger common plan of development or sale, that discharge into your small MS4. Your program must ensure that controls are in place that would prevent or minimize water quality impacts.*
- (ii) *You must:*
 - (A) *Develop and implement strategies, which include a combination of structural and/or non-structural best management practices (BMPs) appropriate for your community.*

- (B) Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under, State, Tribal, or local law; and
- (C) Ensure adequate long-term operation and maintenance of BMPs. (iii) Guidance: If water quality impacts are considered from the beginning stages of a project, new development and potentially redevelopment provide more opportunities for water quality protection. EPA recommends that the BMPs chosen: be appropriate for the local community, minimize water quality impacts; and attempt to maintain pre-development runoff conditions. In choosing appropriate BMPs, EPA encourages you to participate in locally-based watershed planning efforts which attempt to involve a diverse group of stakeholders including interested citizens. When developing a program that is consistent with this measure's intent, EPA recommends that you adopt a planning process that identifies the municipality's program (e.g., adopt a combination of structural and/or non-structural BMPs), operation and maintenance policies and procedures, and enforcement procedures. In developing your program, you should consider assessing these existing ordinances, policies, programs, and studies that address stormwater runoff quality. In addition to assessing existing ordinances, policies, programs, you should provide opportunities to the public to participate in the development of the program. Non-structural BMPs are preventative actions that involve management and source controls such as: policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space (including a dedicated funding source for open space acquisition), provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation; policies or ordinances infill development in higher density urban areas, and areas with existing infrastructure; education programs for developers and the public about project designs that minimize water quality impacts; and measures such as minimization of percent impervious area after development and minimization of directly connected impervious areas. Structural BMPs include: storage practices such as wet ponds and extended-detention outlet structures; filtration practices such as grassed swales, sand filters and filter strips; and infiltration practices such as infiltration basins and infiltration trenches. EPA recommends that you ensure the appropriate implementation of

the structural BMPs by considering some or all of the following: pre-construction inspection and maintenance of BMPs; and penalty provisions for the noncompliance with design, construction or operation and maintenance of BMPs; and penalty provisions for the improved, and EPA recommends that your requirements be responsive to these changes, developments or improvements in control technologies.

Minimum Control Measure: **Post-construction Stormwater Management in New Development and Redevelopment**

Section II.B.5.b.1 –Develop and implement strategies, which include a combination of structural and/or non-structural best management practices (BMPs) appropriate for your community

Schedule and Evaluation

The City Department of Public Works, in collaboration with our GIS Mapping work group, has developed three distinct maps to be used as guidance and recording documents when performing regular site inspections of all the designated BMP locations, private ponds, natural and manmade impoundment basins, TMDL drainage structures, etc..

Responsible Party: Director of Public Works and City Engineer

Necessary Documents

Please refer to GIS Mapping Attachments “B” / “C” / & “D”

Refer to all of the A-Series attachments. Refer specifically to the A-Series Attachments titled as: **AF** {SWM Maintenance Agreement long version} / **AG** {SWM Maintenance Agreement short version}/ **AH** {defined maintenance performance levels} / **AI** {City E & R site inspection reporting form} / **AJ** {Storm Water Outfall Inspection Reporting form}.

Measurable goals

Each performance plan year DPW Forces will conduct and complete, random inspections on 10 of the BMP locations, and 20% of the remaining ponds in the City {see attachment GIS mapping “B”}.

Each performance plan year DPW Forces will conduct and complete, random inspections on a minimum of 20% of the TMDL locations in the City {see attachment "C"}

Items to be reported in the Annual Report

In regards to BMP's, private ponds, other impoundments listed {attachment "B"}, identified TMDL outfall locations {attachment "C"} , and active land disturbance permits {Attachment "E"} , each year the City will provide:

- 1) the number of inspections conducted, and
- 2) results of those inspections, and
- 3) updated reporting layers on the GIS Mapping Guidance

Modifications per required Admin Update: TSD

Minimum Control Measure: **Post-construction Stormwater Management in New Development and Redevelopment**

Section II.B.5.b.2 – Ordinance to address post-construction runoff:

City of Hopewell Ordinance (14-28) requires that the standards and format of Chapter 3 of the current edition of the Virginia Erosion and Sediment Control Handbook be used to control erosion.

The City Engineer requires A&E firms to place Erosion and Sediment Control notes than basically placed the language from Virginia Sediment Control requirements onto construction drawings prior to his plan approval.

Schedule and Evaluation: Approved construction plans are required to have the appropriate E&S notes on the drawings.

Responsible Party: The City Engineer and the City Planner.

Necessary Documents: Approved construction plans since February 1, 2007.

Measurable goals: Plans approved with the appropriate E&S notes.

Items to be reported in the Annual Report: N/A

Modifications per required Admin Update: TSD

Minimum Control Measure: **Post-construction Storm Water Management in New Development and Redevelopment**

Section II.B.5.b.3 –Long term Operation and Maintenance of BMPs:

Conduct site inspection and enforcement measures consistent with the Virginia Storm water Management Act and attendant regulations. In addition to the described LDP inspection program (added again here for reference*) as previously described in section Minimum Control Measures #3 / Section II.B.3.A, the City Engineer, the DPW Permit Inspector, the DPW Surveying Technician and the City GIS Manager conduct site inspections on the noted SWM ponds and BMP's. The Overview GIS map of the City and the attached inventory listing identifies the subject SWM pond and BMPs {See Attachment B}. The inventory identifies the affected water shed acreage. The same inventory listing contains an updating column for the most recent inspection date. All the identified engineered SWM & BMP Ponds will be inspected at least once over the course of 5 years, or sooner, or more often as deemed necessary. DPW is committed to perform inspections more that the minimum requirements. DPW will perform special inspections on all the inventoried SWM & BMP's when a significant weather event occurs, or when significant weather events in series occur (storm training).

As part of the annual inspections DPW will make contact with storm water facility owners and alert them to the deficiencies and required corrections. DPW has established a scale for SWM-Pond Maintenance Grading Level {for scale ref. see attachment AH}. The grading identifies the severity of maintenance from Light [Level 1] to Routine [Level 2] to Rough [Level 3] to Structural [Level 4]. The ponds will be rated according to the assessment scale. The rating determines when and where and if DPW will take action. After each new inspection the grade out scale determining the category level of maintenance will be provided to each facility owner.

The SWM facility owners will be identified on the 2011 Edition of the GIS Overview Map inventory {see Attachment B}.

The Department of Public Works through the City Engineers office, administers to a **Land Disturbance Permitting** (LDP) program that closely or

exactly mirrors the E & S Green Handbook guidelines set forth by DCR. The City Engineer and City Planner have completed the DCR Plan Reviewer & Program Administrator certification training. The City Engineer is currently certified through DCR testing as a Program Administrator (2013) and Plan Reviewer (2011). The design review & permitting inspection programs are both audited annually by the local DCR authorities. Based on the February 2009 audit, the City has noted areas to improve on. The program administration adjustments have been made. The City was notified in May of 2010 that the audit conducted in February found the City to be fully consistent and met all grading categories.

The DPW Permitting E & S program inspector has remained DCR certified and just recently was recertified

The DPW Permit Inspector, under the supervision of the City Engineer, carries out weekly site inspections on all ongoing and outstanding LDP projects. Within 48 hours of a significant weather event the same DPW Permit Inspector performs a site inspection / assessment on all ongoing LDP projects.

The DPW Permit Inspector keeps a chronological diary log book on all the active and incomplete non-active LDP projects.

The DPW Permit Inspector communicates the inspection assessment and all noted corrections to the Responsible Land Disturber (RDL). The Permit Inspector's written report is provided on the official DPW City of Hopewell Inspection Form, which is a mirror image of the Sample DCR form (see attachment A1). The official inspection form outlines the needed corrections, addresses the time or urgency the corrections need to be performed, and consequences if not.

All of the above inspection LDP documentation is kept in the DPW Permit inspectors log book, which remains ready for review by DCR officials whenever requested

Schedule and Evaluation: Prior to PY1 annual report we will determine if City will assume responsibility or prepare for the assumption of maintenance.

Responsible Party: City Engineer and the Developer or Homeowners Association.

Necessary Documents: Written agreement between the parties involved.

Measurable goals: The BMP maintained as required.

Items to be reported in the Annual Report: Copy of our decision and/or agreement.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Pollution Prevention/Good Housekeeping for Municipal Operations**

- (i) *You must develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. Using training materials that are available from EPA, your State, Tribe, or other organizations, your program must include employee training to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.*
- (ii) *Guidance: EPA recommends that, at a minimum, you consider the following in developing your program: maintenance activities, maintenance schedules, and long-term inspection procedures for structural and non-structural stormwater controls to reduce floatables and other pollutants discharged from your separate storm sewers; controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations and snow disposal areas operated by you, and waste transfer stations; procedures for properly disposing of waste removed from separate storm sewers and areas listed above (such as dredge spoil, accumulated sediments, floatables, and other debris); and ways to ensure that new flood management projects assess the impacts on water quality and examine existing projects for incorporating additional water quality protection devices or practices. Operation and maintenance should be an integral component of all stormwater management programs. This measure is intended to improve the efficiency of these programs and require new programs where necessary. Properly developed and implemented operation and maintenance programs reduce the*

risk of water quality problems.

Minimum Control Measure: **Pollution Prevention/Good Housekeeping for Municipal Operations**

Section II.B.6.1 – Maintenance Activities and Operations:

Hopewell has two street sweepers and operates each one nearly 7 hours per day. One sweeper operates during the day shift and for the most part this operator is dedicated to sweeping streets. Because of our work schedule, there are some times that we “borrow” the day sweeper operator to augment other crews. The other sweeper is operated on the midnight schedule and his concentration is the major roadways and non-residential areas. Rarely is he assigned other duties. The night sweeper averages around 100 – 120 miles per week and the day sweeper averages about 50 – 80 miles per week. We believe that our street sweeping efforts have the most positive affect on our stormwater program and as such are probably the most important activity to achieving our stormwater management goals.

Materials swept from City roads and parking lots are disposed of in roll-off containers and taken to a Henrico County landfill.

City crews also police trash along the roadside approximately two days a week.

Schedule and Evaluation: We just started tracking mileage of streets swept and we can use that information to compare monthly production rate. Because we only recently started tracking no benchmark has been established as an indicator of productivity.

Responsible Party: The Street Maintenance Supervisor.

Necessary Documents: Sweeper operator time sheets indicating the areas and mileage swept.

Measurable goals: After a “baseline” is established a monthly comparison can be made from year-to-year.

Items to be reported in the Annual Report: We will report lane miles of roadways swept on an annual basis.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Pollution Prevention/Good Housekeeping for Municipal Operations**

Section II.B.6.2 – Storage and use of salt for snow removal:

Hopewell Public Works' salt storage building was destroyed in May 2005 by a fire and replaced by a larger dome structure. The larger capacity of the new structure will reduce and/or eliminate the need for long-term outdoor storage of salt. During snow events salt and sand are mixed outside and loaded into the spreaders for application on the roadways.

We continue to “tweak” our practices for the reduction of the use of salt by substituting liquid deicers and decreasing the ratio of salt to sand mixes that are applied to the roadways.

Schedule and Evaluation: This is difficult to obtain, as no two weather events are exactly similar in all regards.

Responsible Party: The Streets Supervisor and The Account Clerk

Necessary Documents: Received delivery documents for materials.

Measurable goals: No good indicator due to the variability of the weather but we can try to compare salt, sand, and chemical use from year-to-year.

Items to be reported in the Annual Report: Copies of the received documents and an estimate of materials remaining and not used.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Pollution Prevention/Good Housekeeping for Municipal Operations**

Section II.B.6.3 – City Garage and fueling Station Operation:

We strive to operate the City Garage and Fuel Station in a safe and environmental appropriate manner. The fuel station has an emergency shutoff switch located on the exterior of the Public Works building in case of a major malfunction with the dispensing equipment. Absorbent materials are available at the pumps in case of minor spills. Shop personnel are trained, respond, and cleanup every spill at the fuel pumps and/or City Garage.

The City Garage recycles tires and oil filters to keep these items out of the waste stream. Self-contained units designed for working on radiators, brakes, air conditioners, and fuel tanks are a means of pollution prevention.

Schedule and Evaluation: On-going standard working practices require that we handle these potential pollutants in a responsible manner.

Responsible Party: The Garage Supervisor.

Necessary Documents: We will document major spills and exceptions to our standard operating practices.

Measurable goals: No documented major spills or deviation from normal procedures involving recyclables.

Items to be reported in the Annual Report: Document of major spills and incidents that deviate from standard operating practices involving recyclable products.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Pollution Prevention/Good Housekeeping for Municipal Operations**

Section II.B.6.4 - Operation of the Citizen's Convenience Center:

Hopewell closed its landfill in September 1993, and since has contracted residential refuse pickup. This refuse is taken to a landfill in Henrico County. Because of the loss of our landfill, we opened and operate a Citizen's Convenience Center (CCC). The CCC does not accept refuse and/or hazardous waste. We provide "roll-off" containers for the disposal of construction materials and other "clean" household debris. Tires are accepted if off the rim. When enough tires are gathered at the CCC they

are transported to New Kent County for recycling. White goods are stored on a concrete pad then crashed and recycled as scrap metal. Freon containing appliances are recycled after the Freon is removed and recovered by a certified contractor. Limbs and leaves are stored on the ground and are turned into mulch by tub grinding about every six months. The mulch is available to our citizens, free of charge. There is no charge for CCC disposal to our citizens for yard waste, tires, and white goods. Items placed in roll-off containers and Freon containing appliances have a charge associated with them.

This facility provides a place where residents can properly dispose of items that tend to accumulate around the house and by doing so discourages illegal dumping.

Schedule and Evaluation: The CCC is operated 17 ½ hours per week under normal operation. Twice a year, we provide one weeklong cleanup periods where fees are waived except Freon recovery fees. During these “Citywide Cleanup” periods the CCC is opened between 50 to 60 hours per week.

Responsible Party: The Labor and Trades Supervisor responsible for the oversight of the CCC.

Necessary Documents: N/A

Measurable goals: As long as we provide the CCC we continue to operate according to our current practices and procedures.

Items to be reported in the Annual Report: Changes from the current operations and/or closing of the facility. If there is a significant increase in illegal dumping. Presently illegal dumping is not a major issue in Hopewell.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Pollution Prevention/Good Housekeeping for Municipal Operations**

Section II.B.6.5 –Public Works Use and spraying of herbicides:

Public Works use of fertilizers and herbicides is very limited. Fertilizer is applied to City plants in prepared beds and is diluted with water and fed directly to each plant. Herbicides are used very sparingly usually just in the Downtown area and on grass/weeds growing through cracks in

sidewalks and street gutter pans. A diluted mixture is sprayed directly on each weed during dry weather conditions.

All Public Works employees that spray herbicides are Virginia State certified.

Schedule and Evaluation: No benchmark has been established yet but, effective next growing season we can track chemical usage for year-to-year comparison.

Responsible Party: The Landscaping supervisor.

Necessary Documents: Virginia herbicide applicator certification and purchase receipts for fertilizer and herbicide.

Measurable goals: Compare year-to-year use and where there is a large discrepancy of use among years, try to establish explanation and causes for the increase in use.

Items to be reported in the Annual Report: Copies of herbicide certifications and report quantities of fertilizer and herbicide used in the City right-of-way.

Modifications per required Admin Update: TSD

Minimum Control Measure: **Pollution Prevention/Good Housekeeping for Municipal Operations**

Section II.B.6.6 –Develop and implement an operation and maintenance program consistent with the MS4 Program Plan that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

Training employees on storm water pollution prevention was a requirement of the last permit, and should be well established in the City's MS4 Program. The annual report did not indicate that any training was provided during the reporting period. Please provide a description of the training materials the City obtained, personnel trained, and the dates of training.

Public Works Response

DPW acquired a Stormwater Training Course, titled, “ Municipal Storm Water Pollution Prevention, Storm Watch”, the course consist of a DVD, attendance sheet, handouts, and test. The Course covers, Good Housekeeping & Spill Prevention, Vehicle & Equipment Washing, Vehicle & Equipment Maintenance, Spill Reporting & Response, Street Maintenance, Outdoor Storage of Materials & Wastes, and Landscaping & Lawn Care. Public Works employees reviewed the course on January 4-7, 2010.

Ongoing DPW Operational Programs that target MS4 General Permit Plan & Program objectives include:

- * Regular daily/nightly/weekly -Street Sweeping
- * Very Proactive Storm Basin Cleaning Schedule
- * Storm Pipe Culvert Cleaning Program
- * Annual Ditch-Line Re-Grading & Stabilization Schedule
- * Leaf Collection Program
- * Incident Clean-up / Incident Response Program
- * Invasive Vegetation Control Program

In addition to the above operational examples, and as stated under the previous Minimum Control Measures #1- thru # 5 above, the City of Hopewell, thru the Department of Public Works, does in-fact have an ongoing education training program to all citizens, employees, builders, developers and civil engineering firms wanting to do business in the City. Evidence to this is shown through our informational handouts, the DPW permit review and inspection attachments {see Attachments A thru E} and the ongoing enforcements Land Disturbance Permit programs.

Program Plan Attachments:

A - Series:

- A)** Overview of Principals, Practices & Policies related to Storm Water Management (SMW); **AB)** Policy on Residential Development; **AC)** City adopted Chesapeake Bay Ordinance; **AD)** RPA Guidelines; **AE)** LDP Review and Inspection Checklist; **AF)** SWM Maintenance Agreement [long version]; **AG)** SWM Maintenance Agreement [short version]; **AH)** SWM rating scales on the levels of maintenance; **AI)** E & S LDP Inspection Report; **AJ)** Stormwater Outfall Inspection reporting form.
- B)** GIS Overview SWM Map Inventory PONDS
- C)** GIS Overview SWM Map of all Inventoried “TMDL” Locations
- D)** GIS Overview “Combined” Storm Water Mapping with identified Watersheds

- E)** Land Disturbance Permitting summary sheet – summation list of active site locations with estimated acreage involved

I feel that as a City we do an excellent job of taking the necessary actions to prevent pollution and practice good housekeeping. Our day-to-day work practices toward achieving this goal is commendable, however; I am not aware of a formal training program that pulls park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance together.

A formal employee-training program combining these issues needs to be developed and implemented.

Schedule and Evaluation: By PY 1 annual report this training program will be developed and administered to Parks and Recreation and Public Works employees. Annual refresher training will be required afterwards.

Responsible Party: The Public Works Service Manager

Necessary Documents: Training materials.

Measurable goals: Evidence of a program and number of trained employees.

Items to be reported in the Annual Report: Copies of the program and names of the employees receiving the training.

Modifications per required Admin Update: TSD

City of Hopewell
Attachment for Part 6
**VSMP GENERAL PERMIT REGISTRATION STATEMENT FOR STORMWATER
DISCHARGES**
FROM SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS

Principle Executive Officer or Ranking Elected Official:

Title: City Manager
Name: Dr. Edwin C. Daley

Duly Authorized Representatives

Title: Assistant City Manager
Name: John M. Altman, Jr.

Title: Department of Public Works Director
Name: Phillip E. Elliott, Sr.

Title: City Engineer
Name: Johnnie Butler

The names of the people on this list will be updated as necessary and included as part of the annual report.

(last revision date 8.16.10 pe/jeb)